

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,	:	NO. 2:19-cv-05030-JDW
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE MIDDLE EAST FORUM, et al.	:	
	:	
Defendant.	:	
	:	

MOTION FOR EXTENTION OF 1 WEEK TO RESPOND TO DISPOSITIVE MOTIONS

Plaintiff, Lisa Reynolds-Barbounis hereby moves the Court for an extension of one (1) week to respond to dispositive motions.

1. Plaintiff and Defendants filed respective motions for summary judgment on March 1, 2021.
2. On March 13, 2021, an Order was issued pursuant to a request by the parties that responses to dispositive motions shall be filed on or before April 9, 2021.
3. This request seeks a short extension of one (1) week to Friday, April 16, 2021 for the parties to file their respective responses to dispositive motions.
4. Plaintiff has conferred with Defendants regarding this request. Defendants do not object to Plaintiff's request.
5. Plaintiff makes this request pursuant to time that Plaintiff took off of work in the past two weeks for health reasons.

6. Plaintiff seeks this extension to prepare an adequate response to Defendants' Motion for Summary Judgment which is a lengthy motion that requests the Court rule against Plaintiff on all claims in this case including Plaintiff's claim and Defendants' counterclaims.

7. Plaintiff has agreed that should this request be granted, it would apply to both parties and all responses to dispositive motions will be filed by Friday, April 16, 2021.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff's unopposed Motion for an extension of one (1) week to for the parties to file responses to dispositive motions.

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DATED: April 8, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Motion to be served via ECF.

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DATED: April 8, 2021